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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

JAMES GREIFF,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04357 (SMB)

**DECLARATION OF ARTHUR H. RUEGGER IN SUPPORT OF
DEFENDANT'S (A) REQUEST FOR AN EXPEDITED HEARING AND (B) MOTION
FOR STAY OF TRIAL PURSUANT TO RULE 5011(c) PENDING RULING BY THE
DISTRICT COURT ON DEFENDANT'S MOTION TO WITHDRAW THE REFERENCE**

I, Arthur H. Ruegger, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a Senior Counsel at Dentons US LLP, counsel to defendant, James Greiff. I am a member of the bar of New York and I am admitted to practice in this Court.

2. I submit this declaration in support of Defendant's request for an expedited hearing and Motion for Stay of Trial Pursuant to Rule 50011(c) Pending Ruling by the District Court on Defendant's Motion to Withdraw the Reference.

3. Attached hereto as **Exhibit A** is a true and correct copy of the Complaint, dated November 12, 2010, commencing the above-captioned adversary proceeding (Bankr. S.D.N.Y. Adv. Proc. No. 10-04357-brl) [ECF 1].

4. Attached hereto as **Exhibit B** is a true and correct copy of Defendant James Greiff's Memorandum in Support of Motion to Withdraw the Reference of the Adversary Proceeding Pursuant to 28 U.S.C. § 157(d), Federal Rule of Bankruptcy Procedure 5011, and Rule 5011-1 of the Local Rules, dated March 4, 2020 (Bankr. S.D.N.Y. Adv. Proc. No. 10-04357 (SMB) [ECF 112-1].

5. Attached hereto as **Exhibit C** is a true and correct copy of the Declaration of Arthur H. Ruegger in Support of Defendant's Motion for Withdrawal of the Reference, dated March 4, 2020, including exhibits thereto (Bankr. S.D.N.Y. Adv. Proc. No. 10-04357 (SMB) [ECF 113].

6. On March 5, 2020, I requested that counsel to the Trustee Irving Picard consent to a stay of the proceedings in this Adversary Proceeding, pending a ruling by the District Court on Defendant's Motion to Withdraw the Reference. Counsel to the Trustee declined to consent to any stay.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 9, 2020
New York, New York



ARTHUR H. RUEGGER